

The Honorable John H. Chun
United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Bianey GARCIA PEREZ, Maria
MARTINEZ CASTRO, J.M.Z., Alexander
MARTINEZ HERNANDEZ, on behalf of
themselves as individuals and on behalf of
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES; Ur JADDOU, Director, U.S.
Citizenship and Immigration Services;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; David NEAL,
Director, Executive Office for Immigration
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

PARTIES' JOINT STIPULATION

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Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez
Hernandez; and Defendants U.S. Citizenship and Immigration Services; Ur Jaddou, Director, U.S.

STIPULATION - 1
2:22-cv-00806-JHC

**United States Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
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Citizenship and Immigration Services; Executive Office for Immigration Review; and David Neal, Director, Executive Office of Immigration Review, hereby stipulate to the following with respect to Plaintiffs' Complaint, Motion for Class Certification, and Motion for a Preliminary Injunction, which currently are pending in the above-captioned case:

1. On June 24, 2022, Plaintiffs, based upon the following agreement of the parties, agreed to stipulate to Defendants' request for a full stay for each of the three pending response deadlines: Defendants' responsive pleading to the Complaint, Defendant's response to the Motion for Class Certification, and Defendants' response to the Motion for a Preliminary Injunction, while the parties discuss the settlement of this matter. Plaintiffs filed the Complaint, Motion for Class Certification, and Motion for a Preliminary Injunction on June 9, 2022. Plaintiffs sent a courtesy copy of their filings to the United States Attorney's Office for the Western District of Washington by way of electronic mail on June 9, 2022. The United States Attorney's Office for the Western District of Washington was properly served by way of certified mail on June 13, 2022. Plaintiffs noted their motions for July 1, 2022, consequently setting Defendants' deadline to respond to June 27, 2022. Defendants' responsive pleading to the Complaint is due on August 5, 2022.

2. The parties agree and stipulate that, in responding to Plaintiffs' Motion for Class Certification, Defendants will not oppose class certification on the grounds that the named Plaintiffs' claims may become moot in the interim. Defendants reserve the right to oppose class certification on any other basis.

Good cause exists for the stipulation because of the complexity of the issues in this case and because of the Defendants' recent operational adjustments following the decision imposed

by the District Court for the District of Columbia in *Asylumworks v. Mayorkas*, No. 20-cv-3815, 2022 U.S. Dist. LEXIS 21529 (D.D.C. Feb. 7, 2022). A greater opportunity to reach a settlement would also conserve judicial resources, as well as those of the parties.

The parties respectfully request an order from the Court staying Defendants' responsive deadlines. Currently, Defendants' responses to Plaintiffs' Motion for Class Certification and Motion for a Preliminary Injunction are both due on June 27, 2022. Defendants' response to the Complaint is due on August 5, 2022. The parties further request that the Court set a deadline for a joint status report for August 29, 2022, sixty days from today's date. At that time, the parties will provide the Court with an update on the status of settlement talks and, if applicable, any proposed deadlines.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this 27th day of June 2022.

For the Plaintiffs:

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For the Defendants:

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For the Defendants Continued:

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/s/ Sarah Tate Chambers

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 27th day of June.


The Honorable John H. Chun
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that, on June 27, 2022, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to all counsel of record in this matter.

Dated: June 27, 2022

/s/ Sarah Tate Chambers

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